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August 19, 2019
Via ECFS Filing

Talk America Services, LLC
10802 Executive Center Drive Benton Building Suite 300
Little Rock, Arkansas 72211

FRN: 0023997349
Secretary, Federal Communications Commission
Washington, DC 20554
ATTN: Wireline Competition Bureau

**RE: Talk America Services, LLC
Application to Discontinue Service**

Dear Sir or Madam:

Enclosed for filing please find the Application to Discontinue Service submitted on behalf of Talk America Services, LLC. This filing is made pursuant to Title 47, Section 63.71 to notify the Commission of the Company's intent to discontinue the provision of exchange access and interstate long-distance services to all residential customers in the state of Michigan.

A copy of this filing has been provided to the Service List provided as Exhibit B.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to Sthomas@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant

cc: Talk America - Talk America Services
tms: Via ECFS

Enclosures
ST/cc

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
Section 63.71 Application of)
Talk America Services, LLC)
to Discontinue Services)

File No. _____

Section 63.71 Application of Talk America Services, LLC

Talk America Services, LLC ("Talk America Services" or "Applicant"), hereby seeks authorization pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to discontinue the provision of exchange access and/or interstate long distance services in the state of Michigan. This proposed discontinuance will affect approximately 4,619 existing customers.¹

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services, including those affected by the proposed discontinuance.

Talk America Services provides the following information pursuant to Section 63.71 of the Commission's rules:

1. Name and corporate headquarters address of Carrier

Talk America Services, LLC
10802 Executive Center Drive
Benton Building, Suite 300
Little Rock, AR 72211

2. Correspondence concerning this Application should be sent to:

Sharon Thomas
Consultant to Talk America Services, LLC
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
E-Mail: stthomas@inteserra.com

¹ Talk America Services also intends to disconnect local exchange service (dial tone and local usage), digital subscriber line ("DSL") internet access, and intrastate long-distance services to some of the affected customers. These services are not subject to the FCC's Section 214 discontinuance rules and are, therefore, not included as part of this request for authorization. However, customers are being notified regarding all of the services that are to be discontinued.

3. *Date of Planned Service Discontinuance, Reduction or Impairment:*

Talk America Services proposes to discontinue the services that are the subject of this Application on or after January 6, 2020, pending required federal and state regulatory approval of the discontinuance. Applicant requests that the Commission issue the Public Notice of this discontinuance no later than September 1, 2019, so that the Applicant can comply with the notice requirements of the Michigan Public Service Commission.

4. *Points of Geographic Areas of Service Affected:*

Talk America Services proposes to discontinue all of its telecommunications services in the state of Michigan. Services provided to existing customers will be discontinued and services will no longer be offered to new customers following the proposed discontinuance.

5. *Brief Description of Types of Service Affected and Reason for Discontinuance:*

The table below identifies the types of telecommunications services and affected customers impacted by the proposed discontinuance of service.

| State | Local Exchange/Exchange Access Lines and Intrastate/Interstate Long Distance (Bundled) | Intrastate and Interstate Long Distance Only | Total Affected Customers |
|--------------|---|---|---------------------------------|
| Michigan | 4,542 | 77 | 4,619 |

The services subject to the FCC's jurisdiction that are the subject of this request for authorization are exchange access and interstate long distance. Talk America Services relies exclusively on an underlying provider to provide services in Michigan. The underlying provider has notified Talk America Services that it will no longer provide or support these services. Consequently, Talk America Services must discontinue service to the affected customers.

As described below, Talk America Services is providing all affected customers with ample notice of the discontinuance and has established a dedicated toll-free customer service number to support customers impacted by the discontinuance.

6. *Brief Description of Dates and Methods of Notice to All Affected Customers:*

The Applicant has provided written customer notices of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notices were provided via 1st class U.S. mail to affected customers in five separate mailings: on July 22, 2019, July 29, 2019, August 5, 2019, August 12, 2019, and August 19, 2019. The Company sent the notices in staggered mailings so that its customer service department would have sufficient resources available to handle anticipated customer call volumes as the notices are received by customers. The notice is attached as Exhibit A. (The sample notice provided is dated July 22, 2019; all notices issued on subsequent dates contain identical language.)

A copy of this Application is being sent to the state regulatory commission and governor's office in Michigan, as well as to the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit B.

Conclusion

Talk America Services, LLC respectfully requests that the Commission approve its Section 63.71 Application to discontinue the services described herein. Pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Talk America Services understands that this application will be automatically granted on the 31st day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 19th day of August 2019.

By: /s/ Allison W. Taylor

Allison W. Taylor
Vice President, Operations
Talk America Services, LLC

Sharon Thomas, Consultant to
Inteserra Consulting Group, Inc.
151 Southhall Lane, Suite 450
Maitland, FL 32751
Telephone: 407-740-3031
Facsimile: 407-740-0613
E-Mail: stthomas@inteserra.com

Exhibit A

Customer Notice



2134 W Laburnum Ave.
Richmond, VA 23227

July 22, 2019

Customer Name
Customer Address
City, State Zip

URGENT: Your telephone services will be impacted unless you take action!

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and intrastate and interstate long distance services to all customers in the state of Michigan on or after January 6, 2020, pending applicable regulatory approvals. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Talk America Services at 1-800-962-4772 as soon as possible to discuss your available options for selecting an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider. If you subscribe to our local services, you could lose your dialtone, including your telephone number, with no short-term ability to restore them. If you subscribe to our internet access or long distance services, you will experience loss of those services if you fail to transition to another provider or providers before January 6, 2020. Therefore, you will need to migrate the services you now receive from Talk America Services to an alternative provider **before January 6, 2020.**

A filing is being made with the FCC for approval of this discontinuance of service. The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

You may contact Talk America Services directly to obtain information about this discontinuance. Talk America Services' customer service can be reached at 1-800-962-4772 or customercare@talkamericaservices.com or in writing at 2134 W Laburnum Ave., Richmond, VA 23227. Sincerely,

Talk America Services, LLC

Exhibit B – Service List

Ms. Robin Ancona
Director, Communications
Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48909
Via E-Mail

Office of Governor Gretchen Whitmer
P.O. Box 30013
Lansing, Michigan 48909
Via U.S. Mail

U.S. Department of Defense
Pentagon
Attn. Special Assistant for Telecom.
Washington, DC 20301
Via U.S. Mail

CERTIFICATE OF SERVICE

STATE OF FLORIDA)

COUNTY OF ORANGE)

On this date, August 19, 2019, the foregoing Section 63.71 Application was sent to the Service List contained in Exhibit B by the delivery method indicated on the Service List.

/s/ Keith Rice

For Shipping Department
Inteserra Consulting Group, Inc.